

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
v.	:	CRIMINAL NO. 22-142
LAYE SEKOU CAMARA	:	
a/k/a “K-1”	:	
a/k/a “Dragon Master”	:	

GOVERNMENT’S FOURTEENTH MONTHLY STATUS REPORT

The United States of America, through its attorneys, Jacqueline C. Romero, United States Attorney for the Eastern District of Pennsylvania, and Linwood C. Wright, Jr., Kelly M. Harrell, and Patrick J. Brown, Assistant United States Attorneys for the district, and Chelsea Schinnour, Trial Attorney, United States Department of Justice, pursuant to this Court’s October 3, 2023 order, respectfully submits its fourteenth monthly status report as follows:

1. In an effort to assure that the government fulfills its ongoing discovery obligations, the government submitted relevant information on its foreign witnesses to Department of Justice officials for them to submit these witnesses’ identifiers to relevant intelligence agencies to determine what, if any, information about these witnesses is in the possession these agencies. The agencies have completed gathering possibly responsive information, and the government has completed its review of this information. On June 4, 2024, the government refiled its Motion for a Pretrial Conference Pursuant to the Classified Information Procedures Act (CIPA). As noted in that filing the government proposes a bifurcated *in camera* Section 2 conference in this case. Ultimately, pursuant to Section 4 of CIPA, the government anticipates filing appropriate brief(s) addressing the propriety of deleting, substituting, or disclosing classified information, if any, relating to this prosecution. The

government has completed its draft of its Section 4 brief, and it is currently undergoing the final review process. The government is on track and anticipates filing its Section 4 brief with this Court on or before this Court's December 16, 2024 deadline. The government continues to maintain that at the end of this arguably burdensome CIPA process very few documents will be in play, and those, if any, that are in play, will ultimately have relatively little influence on the timing or outcome of this case.

2. Because of the nature of this prosecution, generating the reports of investigation based on the interviews of numerous foreign witnesses has proven arduous. The government has now produced to the defendant all outstanding Jencks Act material. That said, the government continues to investigate this case in anticipation of trial. If additional Jencks Act material is generated it will be expeditiously produced to the defendant.

Respectfully submitted,

JACQUELINE C. ROMERO
United States Attorney

/s/ Linwood C. Wright, Jr.
LINWOOD C. WRIGHT, JR.
KELLY M. HARRELL
PATRICK J. BROWN
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Government's Fourteenth Monthly Status Report, was filed electronically on the Electronic Case Filing system, is available for viewing and downloading from the ECF system, and/or was served electronically on the following:

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DATED: December 4, 2024